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July 26, 2021

Via ECF

Hon. Jesse M. Furman
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: U.S. v. Baranco (JMF)
20 Cr. 135

Application DENIED. When setting the surrender date/time, the Court was clear that it was incumbent upon counsel to arrange for the Probation interview in that time - and that the Court would grant an extension only if the interview could not happen in that time *as a result of Probation's schedule*. Probation reports that counsel was offered an interview date on July 28th; the fact that counsel chose August 3rd is not a basis for an extension. The Clerk of Court is directed to terminate Doc. #483. SO ORDERED.

July 27, 2021

Dear Judge Furman,

I represent Edgardo Baranco in the above captioned case. Mr. Baranco took a plea before your honor on July 22, 2021. At that time, Mr. Baranco was allowed to remain out until July 29, 2021, at 2pm, to facilitate his pre-sentence interview. An in-person interview has been scheduled for August 3, 2021, at 11am. I am therefore requesting that Mr. Baranco's surrender date be changed to August 19, 2021, at 2pm. The reason for the additional time is to make it easier and more efficient to communicate with and have access to my client should corrections or additional documents be necessary after the first draft of the probation report is submitted to me.

I have conferred with the government, and while they do not consent to a surrender date of August 19, they consent to extending his surrender date until after he has been interviewed on August 3, 2021

cc: AUSA Harper

Respectfully Submitted,

Christine Delince, Esq.